UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

Case No. 1:19-cv-1711

v.

Honorable Thomas M. Durkin

Magistrate Judge Susan E. Cox

RIVER NORTH EQUITY LLC, et. al.,

Defendants.

AGREED MOTION FOR ENTRY OF CONSENT JUDGMENTS AGAINST DEFENDANTS NETK AND NTGL

Plaintiff Securities and Exchange Commission ("the SEC"), respectfully requests that the Court approve and enter the proposed judgments against Defendants NanoTech Entertainment, Inc. ("NTEK") and NanoTech Gaming, Inc. ("NTGL"), in the forms attached hereto as Exhibits 2 and 4.

- 1. Defendant NTEK has agreed to resolve the SEC's claims in this litigation through the entry of a final judgment. (A copy of NTEK's Consent is attached to this motion as Exhibit 1.) NTEK has consented to the entry of a judgment order imposing permanent injunctive relief which prohibits it from violating Section 5 of the Securities Act of 1933 ("Securities Act"). (See Exhibit 2 at § I)
- 2. The SEC's Complaint did not request, and NTEK's consent judgment does not provide for, the payment of any disgorgement or civil penalties.
- 3. Defendant NTGL has agreed to resolve the SEC's claims in this litigation through the entry of a final judgment. (A copy of NTGL's Consent is attached hereto as Exhibit

- 3.) NTGL has consented to the entry of a judgment order imposing permanent injunctive relief which prohibits it from violating Section 5 of the Securities Act. (See Exhibit 4 at § I)
- 4. The SEC's Complaint did not request, and NTGL's consent judgment does not provide for, the payment of any disgorgement or civil penalties.
- 5. The proposed final judgment orders against defendants NTEK and NTGL may be entered immediately, as the parties have agreed.

Wherefore, the SEC respectfully requests that the Court enter the attached final judgments imposing permanent injunctive relief against defendants NanoTech Entertainment, Inc. and NanoTech Gaming, Inc. in the forms proposed as Exhibits 2 and 4.

Dated: December 19, 2019. Respectfully submitted,

/s/ Robert M. Move

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CERTIFICATE OF SERVICE

I hereby certify that on December 19 2019 I served a copy of the foregoing document on all counsel of record by means of the Court's ECF system.

s/Robert M Moye